Exhibit A-2 (*Table 1-1* Violation of Title VII – THE FACTS OF THE CASE)[1]

Column 1 - Disparate Treatment

Line 1 - White females receive developmental assignments who aren't Acquisition Workforce Members; I was denied developmental assignments.

Line 2. - Harassment -Turke said, "The only reason Bettie Peppers and Jeff Connell aren't dead is because it is against the law to kill them."

Line 3 - Compared to the white female on the team about my ability to do a presentation/ briefing.

Line 4- I wasn't invited to all EAP team meetings, while other white female team member was.

Line 5 - Transferred from a team of seven (7) people to a team of two (2) people, while a white female was transferred to a team of seven (7) people.

Line 6- Harassment- Isolated from peers, SIPT and customers, both mentally and physically; humiliated in the presence of others. White female receives cooperation.

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[1] Due to the paper size and font size for this document, originally submitted Table 1-1 on 8-½ size paper has been type on the next pages.

Exhibit A-2 (Table 1-1 Violation of Title VII – THE FACTS OF THE CASE) Continued

Column 2 – Direct Evidence/Discriminatory Intent

Line 1 - Evidence will show training requests were approved for white female who aren't an Acquisition Workforce Member, but I never received approval (EEOC Encl. 3)

Line 2 - Evidence will show intent to incite others into making the same statement and feel the same way he did. (OCI Page 49: 2-6)

Line 3 - Evidence will show intent to defame my professional character and reputation when compared to the white female on the team. (IF Page 177)

Line 4 - Evidence will show intent to create a hostile environment. Training was for the entire team and I was excluded. (IF 142 and IF 191, 2nd paragraph from bottom.)

Line 5 - Evidence will show intent to adversely affect my career progression as an Acquisition Workforce Member when transferred to 2-person team.
Exhibit A-3

Line 6 - Evidence will show intent to defame my professional character, isolate from peers, SIPT and inciting distrust about my ability to be an ILS manager. (Exhibit A-5 & A-1)

Exhibit A-2 (Table 1-1 Violation of Title VII – THE FACTS OF THE CASE) Continued

Column 3 – Adverse Employment Decision

Line 1 - Management Violated Public Law 101-510; Title XII (DAWIA) when they denied me Developmental Assignments and the proper OJT Plan. (Exhibit 26, IF 53, IF 37-38)

Line 2- Team Leader decided to violate the Organizations' "Zero Tolerance" Harassment Policy.

Line 3 - Team Leader Violated the Defamation Act when he decided to damage my professional character and reputation using libelous statements. (IF Page 177, last paragraph) Libel is a crime.

Line 4 - Management decided to hold EAP meetings, in my absence. (Exhibit 25 or IF 145) EEOC prohibits Exparte Communication.

Line 5 - Management Violated DAWIA again when they decided to transfer me to a lower status and non-funded team with a significant change in duties. (Exhibit 20: Page 55) (OCI Page 88: 9:13) (OCI Page 85:2)

Line 6 - Management Violated 5 U.S.C.; CFR 430 when they decided to give me a negative performance appraisal that arose from harassment and isolation. (Tangible Employment Action). *(Exhibit A-4)*

Exhibit A-2 (Table 1-1 Violation of Title VII – THE FACTS OF THE CASE) Continued

Column 4 – The Injury Adverse Impact

Line 1 - Received notices of non-selection for positions applied for due to inadequate training. (Exhibit 18: 49-50)

Line 2 - Restricted opportunities to attend off-site meetings, where Mr. Turke would have to be present as well.

Line 3- Isolated from peers and customers due to lack of their trust in my ability. (Exhibit 19, Page 54)

Line 4- Created a hostile work environment.

Line 5- Reduced promotion potential, reduced opportunity to utilize classroom training, and reduced opportunity to gain experience.

Line 6 - Negative performance appraisal in personnel file resulted in non-responses for promotions.
(Exhibit A-7)

Exhibit A-2 (Table 1-1 Violation of Title VII – THE FACTS OF THE CASE) Continued

Column 5 - Agency's Reason for Adverse Employment Decision[2]

Line 1 - Under Oath, Mr. Turke made the following false statement, "We think we've offered her adequate training opportunities." (OCI 58: 25 and OCI 59; 1)

Line 2 - Under Oath, Mr. Turke made the following false statement, "I never at any time ever made that threat to Ms. Peppers directly or indirectly." (OCI 49: 5-6)

Line 3 - Under Oath, Mr. Turke indicated that the presentation/briefing was too complicated for me to handle. This was a false assessment (OCI page 44; lines 17-25)

Line 4 - Under Oath, Ms. Griffin made the following false statement for the Team " Team was walking on "egg shells" (OCI 141:10). Also indicated in IF 191, 2nd paragraph from bottom.

Line 5 - Under Oath, Mr. Reynolds made the following false statement, "The relationship between Bettie and Steve was affecting the team"
(OCI Page 164; Lines 8-11)

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[2] "The employer's proffered explanation is unworthy of credence," Aikens, 460 U.S. at 716, quoting Burdine, 450 U.S. at 256.5.

Column 5 - Agency's Reason for Adverse Employment Decision[3] (cont')

Line 6 - Need Improvement Performance Appraisal (It is both false and inappropriate). (Exhibit A-4, pages 1 and 2)

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[3] "The employer's proffered explanation is unworthy of credence," Aikens, 460 U.S. at 716, quoting Burdine, 450 U.S. at 256.5.

Exhibit A-2 (Table 1-1 Violation of Title VII – THE FACTS OF THE CASE) Continued

Column 6 – EEO Investigations Proved the Agency's Reason to be False.[4]

Line 1 - Public Law 101-510; Title XII (DAWIA) requires developmental assignments to meet adequate training requirements. (OCI Fact Finding 35:2-7; and Exhibit 2)

Line 2 - Mr. Pordon, the investigator confirmed that this statement was made. (OCI Fact Finding 146:15-18)

Line 3 - He had adequate notice to prepare me to do the briefing just as he had prepared others in the past. (OCI Page 242, line 1-7) I received training on how to do briefings. (IF 156) (IF 158) Recently briefed during a Program Review on August 26, 2002.

Line 4 - Team did not indicate that I was affecting the team. (OCI Page 225:1-4; Page 248: 17-20; Page 233: 21-25; Page 208:17-19; Page 199: 8-11; Page 70: 16-18.)

Line 5 - Team did not indicate that I was affecting the team. . (OCI Page 225:1-4; Page 248: 17-20; Page 233: 21-25; Page 208:17-19; Page 199: 8-11; Page 70: 16-18.)

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[4] Defendant cannot justify "A Business Necessity."

Column 6 – EEO Investigations Proved the Agency's Reason to be False.[5] (cont')

Line 6 - Attempted mediation on January 30, 2003 and defendant did not show a good faith effort to settle. The results of the investigation are discoverable in a court proceeding.

[5] Defendant cannot justify "A Business Necessity."